

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re: ) 20-00243  
 )  
JOHN R. COUGHLIN, ) Chapter 13  
 )  
 ) Judge CASSLING  
Debtor(s). )

**NOTICE OF MOTION**

**The following parties have been served via electronic mail:**

U.S. Trustee: [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)  
Tom Vaughn, Chapter 13 Trustee: [ecf@tvch13.net](mailto:ecf@tvch13.net)

**The following party(s) have been served via regular US mail:**

See attached service list

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his stead, at 219 S. Dearborn, Chicago, IL 60604, in the following courtroom (or any other place posted), and present the attached **Motion for Leave to Sell Real Property**, at which time and place you may appear:

JUDGE: Cassling  
ROOM: 619  
DATE: June 4, 2020  
TIME: 9:30 a.m.

/s/Christine H. Clar  
Christine H. Clar, A.R.D.C. #6202332  
Attorney for the Debtor(s)

**PROOF OF SERVICE**

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, before 5:00 p.m. on May 5, 2020 with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

/s/Christine H. Clar  
Christine H. Clar, A.R.D.C. #6202332  
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES  
Attorney for the Debtor(s)  
790 Chaddick Drive  
Wheeling, IL 60090  
847/ 520-8100  
[davidsiegelbk@gmail.com](mailto:davidsiegelbk@gmail.com)

**The following party(s) have been served via regular US mail:**

Mr. John Coughlin  
5723 W. 129<sup>th</sup> Street, Apt. 9  
Crestwood, IL 60418

Cavalry SPV I  
500 Summit Lake Drive, Ste. 400  
Valhalla, NY 10595

Bridgecrest Credit Co.  
P.O. box 29018  
Phoenix, AZ 85038

Capital One  
Becket & Lee  
P.O. Box 3001  
Malvern, PA 19355-0701

Ellm View Condominium Assoc.  
c/o Tressler LLP  
550 E. Boughton Rd., Ste. 250  
Bolingbrook, IL 60440

NetCredit  
175 W. Jackson Blvd., Ste. 1000  
Chicago, IL 60604

Advocate Health Care  
P.O. Box 1123  
Minneapolis, MN 55440-1123

US Bank National Assoc.  
4801 Frederica St  
Owensboro, KY 42301

Caputo & Popovic  
17730 S. Oak Park Ave., Unit B  
Tinley Park, IL 60477

Keller Williams Preferred Realty  
16101 108<sup>th</sup> Ave.  
Orland Park, IL 60467

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**MOTION FOR LEAVE TO SELL REAL PROPERTY**

NOW COMES the Debtor, by and through his attorneys, DAVID M. SIEGEL & ASSOCIATES, LLC, to present their Motion, and in support thereof states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On January 6, 2020 the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, and the Chapter 13 plan is not yet confirmed. Tom Vaughn was appointed Trustee in this case.
3. The Debtor owns real estate located at 5723 W. 129<sup>th</sup> St., Apt. 9, Crestwood, IL 60418.
4. The Debtor desires to sell said property and shall have any net proceeds paid to his Chapter 13 plan. (Contract pages attached as Exhibit A.)
5. The sale of said property will not prejudice any creditors, and will facilitate the completion of the Debtors' Chapter 13 plan.

WHEREFORE, the Debtor, CHRISTOPHER W. KRESS, prays that this Honorable Court grant Debtors' Motion for Leave to Sell Real Property.

Respectfully Submitted,

/s/ Christine H. Clar  
Christine H. Clar, A.R.D.C. #6202332  
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES, LLC  
Attorney for the Debtor(s)  
790 Chaddick Drive  
Wheeling, IL 60090  
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